

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

In re:)
) Chapter 11
CAPSTONE PEDIATRICS, PLLC)
) Case No. 3:19-bk-01971
Debtor.)
) Judge Randal S. Mashburn
)

**LIMITED OBJECTION TO CORRECTED EXPEDITED MOTION FOR
ORDER APPROVING DEBTOR IN POSSESSION FINANCING**

Landlord/creditors, SL Airpark, LLC and SL Airpark II, LLC (“Landlord”), respectfully submits its limited objection to Debtor’s Corrected Expedited Motion for Order Approving Debtor in Possession Financing (DE # 20). Landlord is owed for pre-petition rent on two leases with Debtor, and Landlord further understands that Debtor intends to continue with Landlord’s leases post-petition. To the extent Debtor does not make the post-petition rent payments, Landlord would have an administrative expense claim. The Motion proposes to grant lender a super-priority administrative expense claim. Landlord objects to the motion to the extent that lender would have priority over Landlord’s administrative expense claim for post-petition rent. Alternatively, Landlord requests that the Order provide for a carve-out for any unpaid post-petition rent.

Respectfully submitted,

/s/ Michael G. Abelow

Michael G. Abelow (No. 26710)

mabelow@srvhlaw.com

SHERRARD ROE VOIGT & HARBISON, PLC

150 3rd Avenue South, Suite 1100

Nashville, Tennessee 37201

Phone: (615) 742-4200

Fax: (615) 742-4539

*Attorney for SL Airpark, LLC and
SL Airpark II, LLC*

CERTIFICATE OF SERVICE

I certify that true and exact copies of the foregoing have been served via the Court's electronic filing system on April 1, 2019 on all filing users accepting electronic service.

/s/ Michael G. Abelow